

FOLGER LEVIN & KAHN LLP
Michael F. Kelleher (CSB No. 165493, mkelleher@flk.com)
Amy L. Kashiwabara (CSB No. 210562, akashiwabara@flk.com)
Embarcadero Center West
275 Battery Street, 23rd Floor
San Francisco, CA 94111
Telephone: (415) 986-2800
Facsimile: (415) 986-2827

BARRIS, SOTT, DENN & DRIKER, PLLC
Stephen E. Glazek (P23186; sglazek@bsdd.com) *Admitted Pro Hac Vice*
Josh J. Moss (P66550; jstefan@bsdd.com) *Admitted Pro Hac Vice*
211 West Fort Street, 15th Floor
Detroit, MI 48226-3281
Telephone: (313) 965-9725
Facsimile: (313) 983-3323

Attorneys for Defendants GENERAL MOTORS CORPORATION and FORD MOTOR COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KUHL WHEELS, LLC and EPILOGICS GROUP,

Plaintiffs,

v.

GENERAL MOTORS CORPORATION and FORD MOTOR COMPANY,

Defendants.

Case No. C06-03356 MJJ

JOINT STIPULATION AND ~~PROPOSED~~
ORDER TRANSFERRING VENUE TO
EASTERN DISTRICT OF MICHIGAN

Judge: Honorable Martin J. Jenkins
Date: November 7, 2006
Time: 9:30 a.m.
Location: Courtroom 11, 19th Floor

Plaintiffs, Kuhl Wheels, LLC and Epilogics Group, and Defendants, Ford Motor Company and General Motors Corporation (collectively the "Parties"), stipulate to the following:

1. Whereas Defendants have filed a motion to transfer venue of this case pursuant to 28 U.S.C. § 1404(a) to the Eastern District of Michigan. Defendants' motion is set for hearing on November 7, 2006 at 9:30 a.m. in this court.

2. WHEREAS, as detailed in Defendants' motion to transfer, a case involving the same patents and products as this case is pending before Judge Cleland, of the Eastern District of Michigan, in the case *Hayes Lemmerz International, Inc. v. Kuhl Wheels, LLC and Epilogics Group*; Case No. 03-70181 (the "*Hayes v. Kuhl Case*").

3. WHEREAS, The Parties stipulate to the transfer of the above-captioned matter to the United States District Court for the Eastern District of Michigan;

4. The Parties agree that, pursuant to Eastern District Local rule 83.11(b)(7)(A), this case should be assigned to Judge Cleland upon its transfer to the Eastern District of Michigan. The Parties further agree that they will take appropriate steps to alert the Eastern District of Michigan that the case should be transferred to Judge Cleland's docket; and

5. The Parties also agree that, whenever reasonable, they will request that Judge Cleland coordinate hearings in this case with hearings in the *Hayes v. Kuhl Case*.

Dated: October 25, 2006

FOLGER LEVIN & KAHN LLP

/s

Michael F. Kelleher
Attorneys for Defendants
GENERAL MOTORS CORPORATION and FORD
MOTOR COMPANY

Dated: October 25, 2006

THE ELSTEAD LAW FIRM

/s

John C. Elstead
Attorneys for Plaintiffs
KUHLE WHEELS, LLC and EPILOGICS GROUP

PURSUANT TO STIPULATION, IT IS ORDERED THAT this case shall be transferred to the Eastern District of Michigan.

Dated: October ____, 2006

Honorable Martin J. Jenkins
United States District Court Judge

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2. WHEREAS, as detailed in Defendants' motion to transfer, a case involving the same patents and products as this case is pending before Judge Cleland, of the Eastern District of Michigan, in the case *Hayes Lemmerz International, Inc. v. Kuhl Wheels, LLC and Epilogics Group*; Case No. 03-70181 (the "*Hayes v. Kuhl Case*").

3. WHEREAS, The Parties stipulate to the transfer of the above-captioned matter to the United States District Court for the Eastern District of Michigan;

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5. The Parties also agree that, whenever reasonable, they will request that Judge Cleland coordinate hearings in this case with hearings in the *Hayes v. Kuhl Case*.


Dated: October ____, 2006

FOLGER LEVIN & KAHN LLP

Michael F. Kelleher
Attorneys for Defendants
GENERAL MOTORS CORPORATION and FORD
MOTOR COMPANY

Dated: October 25, 2006

THE ELSTEAD LAW FIRM


John C. Elstead
Attorneys for Plaintiffs
KUHLE WHEELS, LLC and EPILOGICS GROUP


PURSUANT TO STIPULATION, IT IS ORDERED THAT this case shall be transferred to the Eastern District of Michigan.

Dated: November 6, 2006


Honorable Martin J. Jenkins
United States District Court Judge

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FOLGER LEVIN &
KAHN LLP
ATTORNEYS AT LAW

JOINT STIPULATION AND  ORDER TO
TRANSFER VENUE TO EASTERN DISTRICT OF
MICHIGAN; Case No. 06-033556 MJJ

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